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19 COLLEGE OF THE LAW, SAN FRANCISCO

20  
21 UNITED STATES DISTRICT COURT

22 NORTHERN DISTRICT OF CALIFORNIA

23 SAN FRANCISCO/OAKLAND DIVISION

24  
25 COLLEGE OF THE LAW, SAN  
FRANCISCO a public trust and  
26 institution of higher education duly  
organized under the laws and the  
27 Constitution of the State of  
California;

28 FALLON VICTORIA, an individual;

Case No. 4:20-cv-03033-JST

**DECLARATION OF RHIANNON  
BAILARD IN SUPPORT OF  
PLAINTIFFS' MOTION TO  
ENFORCE STIPULATED  
INJUNCTION**

1 RENE DENIS, an individual;  
2 TENDERLOIN MERCHANTS AND  
3 PROPERTY ASSOCIATION, a  
4 business association;  
5 RANDY HUGHES, an individual; and  
6 KRISTEN VILLALOBOS, an individual,

7 Plaintiffs,

8 v.

9 CITY AND COUNTY OF SAN  
10 FRANCISCO, a municipal entity,

11 Defendant.

**ASSIGNED FOR ALL PURPOSES  
TO THE HONORABLE JON S.  
TIGAR, COURTROOM 6**

Date:  
Time:

Action Filed: 05/04/2020  
Trial Date: (TBD)

12 I, Rhiannon Bailard, declare as follows:

13 1. My full name is Rhiannon Bailard. I am more than twenty-one (21) years of age and  
14 am competent to give testimony and make this Declaration. I submit this Declaration in support of  
15 Plaintiffs' Motion to Enforce Stipulated Injunction. Except as otherwise specifically stated, I make  
16 this Declaration based upon my own personal knowledge. If called as a witness, I would and could  
17 testify to the matters attested to herein.

18 2. I have been employed by then University of California, Hastings College of Law,  
19 now University of California Law San Francisco ("the Law School"), since 2018. My current title  
20 is Chief Operating Officer.

21 3. Between May 2020 and August 2021, the Law School acquired tent and makeshift  
22 shelter counts from the Tenderloin Community Benefits District, which received the information  
23 from Urban Alchemy, a social services non-profit organization. Urban Alchemy was engaged by  
24 the City & County of San Francisco to monitor the number of tents and makeshift shelters in the  
25 Tenderloin neighborhood in order to effectuate the provision of street cleaning services. To do this,  
26 Urban Alchemy employees would walk the Tenderloin neighborhood and record the number and  
27 location of tents and makeshift shelters in the early morning hours.

28 4. On May 28, 2020, Urban Alchemy counted 448 total tents and makeshift shelters in  
the Tenderloin neighborhood.

5. On October 15, 2020, Urban Alchemy counted 22 total tents and makeshift shelters in the Tenderloin neighborhood.

6. In February 2024, the Law School partnered with Urban Alchemy to conduct a new tent count utilizing the same methodology they used in their prior engagement for the City & County of San Francisco. On February 14, 2024, Urban Alchemy counted 71 total tents and makeshift shelters in the Tenderloin neighborhood.

I declare under the penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed this 13<sup>th</sup> day of March, 2024, at San Francisco, California.

By: Rhiannon Bailard  
RHIANNON BAILARD, Declarant